

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 THOMAS WILLIAMS,) CASE NO. 1:21-CV-1863
5)
6 Plaintiff,) JUDGE BOYKO
7)
8 versus)
9) DEPOSITION OF
10 MICHELLE HUNG, et al.,)
11) MICHELLE HUNG
12 Defendants.)

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12 Deposition of **MICHELLE HUNG**, a Defendant herein,
13 called by the Plaintiff for Cross-Examination pursuant
14 to the Federal Rules of Civil Procedure, taken by the
15 undersigned, Shannon L. Newhall, a Registered
16 Professional Reporter and Notary Public in and for the
17 State of Ohio, at the offices of Sutter O'Connell,
18 3600 Erieview Tower, 1301 East 9th Street, Cleveland,
19 Ohio, on Friday, the 29th day of April, 2021, at 1:27
20 p.m.

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23
24 SN COURT REPORTING, LLC
25 shannon@sncourtreporting.com
 330.417.4242

EXHIBIT
A

1 Sure.

2 Question: Because she wasn't being
3 honest with you, was she?

4 Answer: It's certainly not an example of
5 honesty.

6 Question: It's not a good example of
7 honesty, is it? Correct?

8 Answer: It's not.)

9 A. I cannot speak to Commissioner Lundy's feelings at
10 the time. However, I did not disclose to him
11 about the relationship.

12 Q. Do you disagree with his statement this morning
13 that it was not an example of honesty?

14 A. I can't agree or disagree to his feelings, because
15 those were feelings he had.

16 Q. I'm asking if you in general -- do you think that
17 what you did by not disclosing that was an example
18 of dishonesty?

19 A. Commissioner Lundy is speaking about his feelings,
20 and I can't comment about the honesty or
21 dishonesty of his feelings.

22 Q. Do you think that what you did by not disclosing
23 this to either of the two commissioners, while at
24 the same time having Harry Williamson become the
25 director of 911, was dishonest?

1 MR. CAHILL: Objection to form, compound,
2 lack of foundation.

3 You can answer.

4 A. I think I omitted the information, but I didn't
5 have feelings that I was intentionally honest or
6 dishonest with them.

7 Q. So by omitting information about a man that you
8 are sleeping with, that ultimately gets hired by
9 the county, you think that's okay, right?

10 MR. CAHILL: Objection to the form;
11 argumentative.

12 You can answer.

13 A. I didn't feel it was necessary information to
14 disclose.

15 Q. So what are you telling me? You are above the
16 law? You don't have to tell your co-commissioners
17 that you are having an affair with somebody that
18 they just hired?

19 MR. CAHILL: Objection.

20 Q. Is that what you are telling us?

21 MR. CAHILL: Objection to the form;
22 compound, argumentative.

23 You can answer.

24 A. I don't really understand the question, sir.

25 Q. Well, are you telling me that you don't feel that

1 about your affair, even though this guy was
2 hired as a director; is that correct?)
3 A. You are going to have to be a little more specific
4 on that.
5 Q. How specific do you want me to get? You were
6 having an affair with Harry Williamson, right?
7 A. You are aware.
8 Q. Is that yes or no?
9 A. Yes.
10 Q. You got elected to be county commissioner,
11 correct?
12 A. Yes.
13 Q. You took office on January 4th, 2021, correct?
14 A. Yes.
15 Q. Harry Williamson got hired as the director of 911,
16 correct?
17 A. Yes.
18 Q. You did not tell Commissioners Lundy or Moore
19 about your relationship with Harry Williamson,
20 correct?
21 A. Yes.
22 Q. So given that scenario, wouldn't it be fair to
23 state that you were not being forthright, correct?
24 A. No.
25 Q. So now you disagree that --

1 A. I didn't need to volunteer the information.

2 Q. Well, if you are -- if you are going to -- if you
3 are going to have a man that you are having an
4 affair with become a director, you don't feel you
5 have to volunteer that information to the other
6 two commissioners; is that correct?

7 MR. CAHILL: Objection to the form.

8 A. I did not feel I needed to volunteer the
9 information.

10 Q. Well --

11 A. Are we passing notes now?

12 MR. NOVAK: Rob, could you tell her to
13 behave a little bit, please?

14 MR. CAHILL: Could we take a break for a
15 minute?

16 MR. NOVAK: Sure.

17 (Whereupon, a brief recess was taken.)

18 BY MR. NOVAK:

19 Q. During the course of the last 24 hours, have you
20 consumed any alcohol?

21 A. No.

22 Q. During the course of the last 24 hours, have you
23 consumed any medication of any kind?

24 A. [REDACTED]

25 [REDACTED]